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William Meehan, David Schlotterbeck,
11 Mercedes Johnson, Robyn M. Denholm, and Nominal
Defendant Juniper Networks, Inc.
12
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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17) Master File No. 11-CV-4792-LHK
18)
19 IN RE JUNIPER NETWORKS, INC.)
SHAREHOLDER DERIVATIVE LITIGATION) **STIPULATION AND ~~PROPOSED~~**
20) **ORDER TEMPORARILY STAYING**
21) **ACTION**
22)
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28)

1 Having conferred pursuant to the Court's Order Proposing a Stay of Proceedings in
 2 Consolidated Derivative Actions dated January 30, 2012, the parties hereby stipulate and agree,
 3 and request that the Court order, as follows:

4 1. In the interests of efficiency, the above-captioned consolidated shareholder
 5 derivative action should be and is hereby stayed until such time as an order is entered denying a
 6 motion to dismiss in the related class action *City of Royal Oak Retirement System v. Juniper*
 7 *Networks, Inc., et al.*, Case No. 11-CV-04003-LHK (the "Class Action");

8 2. The Defendants hereby withdraw their Motion to Proceed in One Forum without
 9 prejudice to Defendants' rights to renew that motion or to seek a further stay in the event that an
 10 order is entered denying a motion to dismiss in the Class Action and the plaintiffs in the
 11 currently pending state derivative action captioned *In re Juniper Networks, Inc. Shareholder*
 12 *Derivative Litigation*, Lead Case No. 111CV-207701, are prosecuting or seek to prosecute that
 13 action;

14 3. Any party may, for good cause shown, move the Court to lift the stay at any time;

15 4. The current deadline to amend the complaint and the motion to dismiss briefing
 16 schedule are vacated, and the Case Management Conference scheduled for March 22, 2012 is
 17 hereby adjourned;

18 5. In the event that an order is entered denying a motion to dismiss in the Class
 19 Action, the following schedule shall apply:

20 (a) Plaintiffs shall file their amended complaint within thirty days of the date
 21 the Court issues an order denying in whole or in part a motion to dismiss the Class Action;

22 (b) Defendants shall file their motion(s) to dismiss the amended complaint
 23 within thirty days thereafter;

24 (c) Plaintiffs shall file their opposition(s) to Defendants' motion(s) to dismiss
 25 thirty days thereafter; and

26 (d) Defendants shall file their reply(ies) in support of their motion(s) to
 27 dismiss within 21 days thereafter.

1 Dated: February 3, 2012

LEVI & KORSINKY, LLP

2
3 By: s/ Doug Julie
Doug Julie

4 *Attorneys for Plaintiffs Olga Ratinova and Lisa E.*
5 *Coppola, IRA*

6 Dated: February 3, 2012

LAW OFFICES OF DAVID A. BAIN, LLC

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9 *Attorneys for Plaintiff Lisa E. Coppola, IRA*

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11 Dated: February 3, 2012

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18 Dated: February 3, 2012

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22 *Inc. and Defendants Kevin Johnson, Scott Kriens,*
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24 *Cranston, John Michael Lawrie, Stratton Sclavos,*
25 *William R. Stensrud, William Meehan, David*
26 *Schlotterbeck, Mercedes Johnson and Robyn M.*
27 *Denholm*

ORDER

The above stipulation having been considered, and good cause appearing therefore,
IT IS SO ORDERED. The Clerk shall administratively close the file.

DATED: February 6, 2012



THE HONORABLE LUCY H. KOH
United States District Judge